

**FILED UNDER SEAL**

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*Attorneys for Plaintiff*  
KOJI IP, LLC

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

KOJI IP, LLC,  
Plaintiff,  
v.

RENESAS ELECTRONICS AMERICA,  
INC.,  
Defendant.

Case No.: 3:24-cv-03089-PHK

**SUPPLEMENTAL DECLARATION OF  
SUSAN KALRA IN SUPPORT OF  
RESPONSE TO SHOW CAUSE  
ORDER**

**Date: September 19, 2024**

**SUPPLEMENTAL DECLARATION OF SUSAN KALRA**

I, Susan Kalra, declare as follows:

1. I am over the age of 18. I have personal knowledge of the facts contained herein, which are true and correct. If called as a witness, I could competently testify to these statements.

2. I am licensed to practice law in the state of California and am an attorney with the law firm of Ramey LLP. I represent the Plaintiff in the above-captioned lawsuit.

3. [REDACTED] We moved into our family home at [REDACTED]  
[REDACTED] California in May 1994, and we raised our two children in our home.  
[REDACTED]  
[REDACTED] California. My office was, and still is, located at 303 Twin Dolphin Drive, Suite 600, Redwood City, California.

4. [REDACTED]

5. [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

6. [REDACTED]

[REDACTED]

7. [REDACTED]

[REDACTED]

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]

12 8. [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]

21 [REDACTED]

22  
23 9. As I began to understand the impact [REDACTED]  
24 [REDACTED]. This realization, along with the ongoing stress, severely  
25 impacted my health. [REDACTED]

26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]

1 [REDACTED]  
2 [REDACTED].  
3 10. In February 2024, my medical providers [REDACTED]  
4 [REDACTED] advised me to reduce my responsibilities and my stress as  
5 much as possible.  
6

7 11. [REDACTED]  
8 [REDACTED]  
9 [REDACTED] I am in the San Francisco Bay Area frequently,  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED] While there, I work in my office in Redwood City.

14 12. With respect to work, I informed the Partners at Ramey LLP generally about my marital  
15 issues in July 2023, and generally about my financial situation at or around that same time. I also  
16 informed them in February 2024 about the advice I received from my health care providers. As  
17 is set forth in my non-confidential Declaration, during this time, I relied on the highly competent  
18 Partners at the Ramey LLP firm to work on cases and court filings including claim charts, and I  
19 utilized the firm's staff to assist with filings. I reviewed documents including complaints and  
20 memoranda before they were filed.  
21

22 13. [REDACTED]  
23 [REDACTED]  
24 [REDACTED]

25 14. [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]

1 [REDACTED]  
2 [REDACTED]  
3 I declare under penalty of perjury under the laws of the United States of America that the  
4 foregoing is true and correct.  
5

6 Executed on September 12, 2024.

/s/ Susan Kalra  
Susan Kalra